UNITED STATES BANKRUPTCY COURT
Eastern District of Wisconsin

In the Matter of:

Yalonda Graham

Debtor(s).

Chapter 13

Case No. 16-23779

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Yalonda Graham ______________________________ (*Name of proponent of modification*) has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court
517 E. Wisconsin Avenue
Room 126
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Attorney Clifton G. Owens 1010362
Clifton G Owens
8131 W Capitol Dr
Milwaukee, WI 53222-1919

If you, or your attorney, do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

Attorney Clifton G. Owens
Clifton G Owens
8131 W Capitol Dr
Milwaukee, WI 53222-1919
4144625050
4144627114

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is:
   - ☑ the Debtor;
   - ☐ the Chapter 13 Trustee (post-confirmation modifications only);
   - ☐ the holder of an unsecured claim (post-confirmation modifications only).

   Name: ______________________________

2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
   - ☐ A. post-confirmation;
   - ☑ B. pre-confirmation (Select i. or ii);
     - ☐ i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
     - ☑ ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)).
       The creditors affected are: See attached list

3. The Proponent wishes to modify the Chapter 13 Plan to do the following:
   Correct objections raised by the Chapter 13 trustee's office

4. The reason(s) for the modification is/are:
   Provide for the different amount to unsecured creditors. and modify payment to the Chapter 13 trustee

5. Select A. or B.
   ☐ A. The Chapter 13 Plan confirmed or modified on ____________________ is modified as follows:
   (State the specific language of the modification.)

   ☑ B. The unconfirmed Chapter 13 Plan dated 9/18/16 is modified as follows:
   Debtor will pay $588 per month for 60 months commencing December 2016. No payments will be made to the trustee during the summer months of July and August of each year plan is in effect. Debtor will pay a total of $27,900 per the "Means Test". Unsecured creditors will be paid pro rata after attorney fees are paid in full. Attorney for the debtor will file a fee application. Secured creditors will be paid outside the plan.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

______________________________ ______________________________
Debtor Date

______________________________ ______________________________
Debtor Date

OR

2. I Attorney Clifton G. Owens, attorney for debtor(s) Yalonda Graham ______________ certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

Atty. Clifton G Owens
Counsel for the debtor(s)

November 22, 2016
Date

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated: November 22, 2016

at Milwaukee Wisconsin.

Attorneys for Yalonda Graham Clifton G Owens

By: Attorney Clifton G. Owens

Bar No. 1010362

United States Bankruptcy Court
Eastern District of Wisconsin

In re Yalonda Graham
Debtor(s)

Case No. 16-23779
Chapter 13

CERTIFICATE OF SERVICE

I hereby certify that on 11/22/16 a copy of NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below.

Attorney Rocky L Coe
3873 N Sherman Blvd
Milwaukee, WI 53216

Attorney John Leppanen
633 W Wisconsin #1410
Milwaukee, WI 53203

Attorney Brenda Lewison
633 W Wisconsin #1410
Milwaukee, WI 53203

Law Offices of Arthur Heitzer
633 W Wisconsin #1410
Milwaukee, WI 53203

/s/ Attorney Clifton G. Owens
Attorney Clifton G. Owens 1010362
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